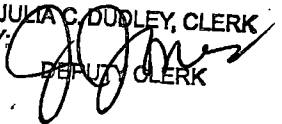


JAN 26 2018

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

ELIZABETH SINES, et al.,

Plaintiffs,

v.

JASON KESSLER, et al.

Defendants.

Case No. 3:17-cv-00072-NKM

Hon. Norman K. Moon

**DECLARATION OF KYLE CHAPMAN IN SUPPORT OF
FRATERNAL ORDER OF ALT-KNIGHTS' MOTION TO DISMISS**

I, Kyle Chapman, declare and state:

1. On December 21, 2017, I was personally served with the initial Summons and Complaint in Oakland, California c/o Fraternal Order of the Alt-Knights (FOAK).

2. On January 10, 2018, I was served with the First Amended Complaint via U.S. postal certified mail at my residence in Daly City, California.

3. FOAK is a loosely created grass root social media Facebook Group and/or Twitter handle. However, there is no official Facebook Group or Twitter handle. Any FOAK Facebook group or Twitter handle were created by individuals other than myself. I did not create or run any Facebook group or Twitter handle. Nor have I directed anyone else to create or run any official FOAK Facebook group or Twitter handle. In fact, a search for FOAK will easily yield multiple groups or handles with similar or same names that are in no way affiliated with each other.

4. FOAK does not conduct any business, for profit or otherwise.

5. FOAK does not have an official membership process nor does it collect any dues or payments.

6. FOAK never had an office, agent or property in Virginia. Nor is it capable of holding property.

7. FOAK never reached into Virginia to solicit or initiate business, including creating a Virginia Facebook Group or Twitter handle.

8. FOAK does not transact or perform any activities in Virginia.

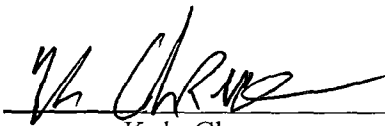
9. If there were any FOAK members at the Charlottesville rallies on or about May 13, June, July 8, August 11 or 12, 2017, they attended them on their own accord and not as a representative of FOAK or myself.

10. I personally was not even at any of the Charlottesville rallies on any of the dates referenced in the complaint, including May 13, June, July 8, August 11 or 12, 2017. In fact, I have never even been to the state of Virginia.

11. Invictus Sol Augustus no longer associates with FOAK. Upon information and removed himself as a member of the FOAK Facebook group on or about November, 2017.

I declare under penalty of perjury under the laws of the United States and the State of Virginia that the foregoing is true and correct.

Executed this 26th day of January, 2018, in Daly City, California.



Kyle Chapman